

United States District Court
Southern District of Texas
Corpus Christi Division

United States Courts
Southern District of Texas
FILED

APR 21 2021

Nathan Oehsner, Clerk of Court

Bobbie Lee Haverkamp
Plaintiff

vs.

Civil Action 2:17-CV-18

Joseph Penn, et al
Defendant

Advisory to Court on Potential
Monetary Liability to Defendants
in the above civil action.

To the Honorable Court of Said Court,

Now Comes, Ms Bobbie

AKA the Plaintiff and has need to brief this
Court that the above Defendants have created
a situation where physical harm can occur
to Courts party to intervene AKA Shanon
Kelly Vinsom.

Arguement

Yours Honors, Vinsom now known as "Selene"
for the purpose of this Advisory.

- 2 also DE 186 the Motion to Intervene
was denied yet came with a Court order for
reasons for the denial.
- 3 On 4/6, the Court presumed there is
a presumption that the Plaintiff can
adequately represent their overall interest,
hence the Advisory to this Court.
- 4 The Court is well aware that in
a 5th Circuit case G.bon/Koslet supra that
Koslet was living (angry as a woman), long
hair, make-up, clothes).
- 5 The Court is well aware the 5th Circuit
ruled non-invasive treatments for Gender
Dysphoria were well within good medical
practices) these being Hormones, Electrolysis,
female clothing and accessories, mental
health services, long hair to shoulder length.
- 6 Due to the presumption of representation
by the Plaintiff the burden to advise the
Court falls squarely on the Plaintiff's shoulders.
- 7 Seleni was served a case for refusal
to comply with grooming standards of a hetero-
sexual male Exhibit 2

8 The Intervention Defendants in DE
186 and Safe Prison Sgt Rogers and her
supervisor will be held responsible for any
self harm by Selene.

9 The issue of her hair has surfaced to
the point she becomes so stressed she cuts
her penis and testicals.

There is not a bit of mental help,
the intervention Defendants thru Dr. Joseph
Penn has the Power) to write a 6 month long
hair pass to Selene till the Plaintiff can
resolve this matter.

10 In the Formation of Issues, the Plaintiff
is inserting the argument for Long Hair Pass
that is also in the C.I. Actions' relief.^①

11 Your Honor, the Plaintiff certainly won't
tell a Warden how to run his prison but on
the other hand the Plaintiff will not sit by and
let a Policy (a) Heterosexual Males be applied
to Selene where she self harms herself.

12 Taking this to a Jury as where the
present C.I. Action is going, the Plaintiff
would have a difficult time why she did not
defend Selene.

see Exhibit 1

3 "Selene" falls under Policy G-51-11 with attachments dated 5/16/2012, the Court is well aware the present Civil Action is finnishing up Defendants.

4 The Court is also aware that the Plaintiff is dropping Dr. Lawrence Linthicum MD and Director of Medical Health for TDOT.

5 Your Honor), very few people know of the Official Step 2 Grievance where the Office of Professional Standards said the specialist will follow Policy G-51-11 with attachments to treat this condition.

6 This command puts responsibility on Corbello's defendants, right now the Plaintiff has a hedge around the issue of Trans-gender health with non-invasive treatments and sex-reassignment surgery where no one can come in until this matter is settled.

7 The problem is "Selene" is [IN] the hedge's circle [WE] all are aware of her disability in Gender Dysphoria that if pushed she will harm herself.

18 The Stiles Unit has 3 Building A+C pods for Safe-Keeping and Trans-genders.

19 Everyone knows the issue (s) Transgenders Health is in a flux, we have people running around the unit in General Population with Long Hair, Exhib. 1 explains it to the Court.

20 The Plaintiff has went in front of Stiles Unit Safe Keeping Boards with Sgt Rogers, Sgt for Safe-Keeper, and is well aware of the present Civil Action as well as Warden Williams.

21 Selene is supposed to be able to grow her hair above shoulder length. Yes, Your Honor, its a good old boy agreement but it satisfied Selene to where she's left the razors Blade alone and we are not life flighting her to Galveston.

22 Summary

- 1). Exhib. 1 included
- a) Corlellor's Defendants are well aware of they failed to give Selene a long hair pass.
- 3). Safe Prisons is aware of the mental disorder and fails to inform to Galveston Dr. Penn Director of Mental Health.
- 4) Your Honor, all of this points to deliberate indifference under the Ramos-V-Lamb standard^②

② 101 S.Ct 1759

5. Corbelli has caused confusion, any self-harm by Selene will prompt Civ. Action with monetary damages for her intent.

Here's the options.

- 1) Back off the long hair issue, we can good old boy till we get Transgender Health settled
- 2) Issue long hair passes for 6 months to Selene, as a special medical pass for mental stress.
- 3) The Plaintiff will defer any passes to her till the issue is Court settled, other transgenders have to defer also due to the author of the Civ. Action defers).

23 Your Honor no action is required of the Court at this time. The Plaintiff strongly suggest the Intervention Defendants and Safe Prison take action, there will be no further harm to Selene due to their indifference under the Ramos/Lamb standard supra

So Prays the Plaintiff

Ms Bobbie

4-9-2021

Certification of Service

24. The Plaintiff swears under the penalty of perjury this was drop in the States Prison mail box April 9, 2021 for delivery to

Texas Attorney General - Corbello

D.O. 12548

Austin, Texas 78711-2548

by the Clerk of the Court due to the Plaintiff has no way to reproduce the Document

The Clerk is also direct to make a copy to

25

Safe-Person Ms Roger, Sgt

St. Louis Unit

3060 FM 3514

Brenham, Texas 77705

So Party's file Plaintiff

Ms Bobbie

4-9-2021

Right Behaved Boys

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c/o

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